

In The United States District Court
For the District of Delaware

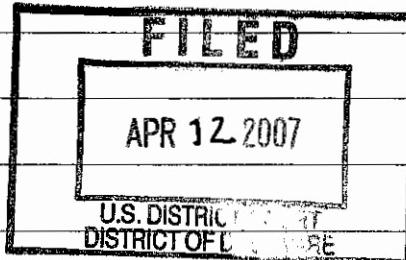
James S. Louis
plaintiff

resubmit

v.
Lt Cheryl Morris, Del.
Chris Kleen administrator
Michael Knight and all officers
and supervisors of the prison
systems in State of Delaware
(to be named later, now known
as John Does) who violated
Constitutional rights mentioned

Motion for
Appointment of
Counsel
Civil Action No.

06 - 236 - 5LR



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Pursuant to 28 USC § 1915(e)(1) plaintiff
(or plaintiffs) moves for an order appointing
counsel to represent him in this case. In
support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel. He has
requested leave to proceed in forma pauperis and was
granted.

2. Plaintiff's imprisonment will/has greatly
limited his ability to litigate. The issues of this
case are complex, and will require significant
research and investigation. Plaintiff has limited access
to the law library and limited knowledge of the law.

3. A trial in this case likely will involve

Counsel can explain the applicable legal principles to the Complainant and... limit litigation to potentially meritorious issues. In addition, appointment of a lawyer provides the unrepresented inmate with an opportunity to obtain representation equally qualified with the professional counsel usually provided by the state for the defendant.

Knighton v Walker 616 F2d 795

Counsel can address all issue that appear to have merit under the law.

investigate the facts. (persons released or transferred to other prisons.)

ability to present the case. Tabron v Thorne 6F3d 156

Complexity of the case because it involves question of constitutional violation (reasons for retaliation)

conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses).

4. Plaintiff's inability to get State documents involved in this case and to obtain documents showing inmate assignments and work schedules done by other inmates are impossible for him and would dictate subpoenas done by an attorney.

5. Plaintiff's inability to talk to other inmates who have come forward to back up plaintiff's complaints and allegations. And ability to question guards has has already been shown in a disciplinary hearing plaintiff was already denied access to witnesses against the state.

Wherefore, plaintiff request that the court appoint a member of the bar as counsel to represent plaintiff in the case.

6/27/2006

4/10/2007

James St. Louis

446518

1181 Paddock Rd
Angeles Ca.

Certificate of Service

I, James St. Louis, hereby certify that I have served a true and correct cop(ies) of the attached: Motion for more definite Statement of Act of Counsel upon the following parties/person (s):

TO: United States District Court TO: _____
District of Delaware
Lockbox 18
844 King Street
Wilmington Delaware 19801

TO: Eileen Kelly TO: _____
Deputy Attorney General
820 N. French St. 6th Floor
Wilmington
Delaware 19801

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 10th day of April, 2007
James St. Louis
SBI 446518